

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
STEVE P. KENNEDY,)
STEPHEN L. BROWN,)
Defendants.)
CRIMINAL NO: 20-cr-30136-NSR
Title 21, United States Code,
Sections 841 and 846
Title 18, United States Code,
Sections 2, 922, and 924

INDICTMENT

FILED

THE GRAND JURY CHARGES:

SEP 09 2020

COUNT 1 CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
ATTEMPT POSSESSION WITH INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE IN CONCURRENCE

On August 21, 2020, in Madison County, Illinois, within the Southern District of Illinois,

STEVE P. KENNEDY,

aided and abetted by

STEPHEN L. BROWN,

defendants herein, knowingly and intentionally attempted to possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(B)(ii)(II), and Title 18, United States Code, Section 2(a).

COUNT 2

POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME

On August 21, 2020, in Madison County, Illinois, within the Southern District of Illinois,

STEVE P. KENNEDY,

defendant herein, did knowingly possess a firearm, being a GSG .22 caliber semi-automatic handgun bearing serial number F434938, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Attempt Possession with Intent to Distribute a Controlled Substance: Cocaine, as charged in Count 1, all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 3
FELON IN POSSESSION OF A FIREARM

On or about August 21, 2020, in Madison County, within the Southern District of Illinois,

STEVE P. KENNEDY,

defendant herein, knowingly possessed a firearm in and affecting commerce, that is, being a GSG .22 caliber semi-automatic handgun bearing serial number F434938, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime, all in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

As a result of the foregoing offenses described in Count 1,

STEVE P. KENNEDY,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violation alleged in Count 1 of this Indictment. The property includes but is not limited to the following:

- a. **\$33,000.00 in United States currency; and**
- b. **\$5,000.00 in United States currency.**

As a result of the foregoing offenses described in Count 3,

STEVE P. KENNEDY,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in any knowing violation of the offense described in this Indictment, including, but not limited, to the following: a GSG .22 caliber semi-automatic handgun bearing serial number F434938, and any and all ammunition contained therein or seized therewith.

As a result of the foregoing offenses described in Count 1,

STEPHEN L. BROWN,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violation alleged in Count 1 of this Indictment. The property includes but is not limited to **\$5,000.00 in United States currency.**

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[REDACTED]

Amanda M. Fischer
AMANDA M. FISCHER
Assistant United States Attorney

Steven D. Weinhoeft
STEVEN D. WEINHOEFT
United States Attorney

Recommended Bond: \$50,000 unsecured (as to both defendants)